

Mark C. Mao, CA Bar No. 236165  
 Beko Reblitz-Richardson, CA Bar No. 238027  
**BOIES SCHILLER FLEXNER LLP**  
 44 Montgomery St., 41st Floor  
 San Francisco, CA 94104  
 Tel.: (415) 293-6800  
 mmao@bsflp.com  
 brichardson@bsflp.com

Jesse Panuccio (admitted *pro hac vice*)  
**BOIES SCHILLER FLEXNER LLP**  
 1401 New York Ave, NW  
 Washington, DC 20005  
 Tel.: (202) 237-2727  
 Fax: (202) 237-6131  
 jpanuccio@bsflp.com

Amanda K. Bonn, CA Bar No. 270891  
**SUSMAN GODFREY L.L.P.**  
 1900 Avenue of the Stars, Suite 1400  
 Los Angeles, CA 90067  
 Tel: (310) 789-3100  
 Fax: (310) 789-3150  
 abonnn@susmangodfrey.com

*Attorneys for Plaintiffs*

William Christopher Carmody  
 (admitted *pro hac vice*)  
 Shawn J. Rabin (admitted *pro hac vice*)  
 Steven M. Shepard (admitted *pro hac vice*)  
 Alexander P. Frawley  
 (admitted *pro hac vice*)  
**SUSMAN GODFREY L.L.P.**  
 1301 Avenue of the Americas,  
 32<sup>nd</sup> Floor  
 New York, NY 10019  
 Tel.: (212) 336-8330  
 bcarmody@susmangodfrey.com  
 srabin@susmangodfrey.com  
 sshepard@susmangodfrey.com  
 afrawley@susmangodfrey.com

John A. Yanchunis (admitted *pro hac vice*)  
 Ryan J. McGee (admitted *pro hac vice*)  
 Michael F. Ram (admitted *pro hac vice*)  
 Ra O. Amen (admitted *pro hac vice*)  
**MORGAN & MORGAN**  
 201 N. Franklin Street, 7th Floor  
 Tampa, FL 33602  
 Tel.: (813) 223-5505  
 jyanchunis@forthepeople.com  
 rmcgee@forthepeople.com  
 mram@forthepeople.com  
 ramen@forthepeople.com

**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA**

ANIBAL RODRIGUEZ, JULIEANNA  
 MUNIZ, ELIZA CAMBAY, SAL  
 CATALDO, EMIR GOENAGA, JULIAN  
 SANTIAGO, HAROLD NYANJOM,  
 KELLIE NYANJOM, and SUSAN LYNN  
 HARVEY, individually and on behalf of all  
 others similarly situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

Case No.: 3:20-cv-04688

**DECLARATION OF ALEXANDER P.  
 FRAWLEY IN SUPPORT OF  
 ADMINISTRATIVE MOTION TO SEAL  
 PORTIONS OF THIRD AMENDED  
 COMPLAINT**

The Honorable Richard Seeborg  
 Courtroom 3 – 17th Floor  
 Trial Date: Not Yet Set

**DECLARATION OF ALEXANDER P. FRAWLEY**

I, Alexander P. Frawley, declare as follows.

1. I am an associate with the law firm of Susman Godfrey L.L.P, counsel for Plaintiffs in this matter. I am an attorney at law duly licensed to practice before all courts of the State of New York, and admitted *pro hac vice* in this case. (Dkt No. 81). I have personal knowledge of the matters set forth herein and am competent to testify.

2. Pursuant to Civil Local Rule 79-5(e), I submit this Declaration in Support of Plaintiffs' administrative motion to seal portions of the Third Amended Complaint. The Third Amended Complaint references material that Google LLC ("Google") has designated as "Confidential" and "Highly Confidential – Attorneys' Eyes Only" under the parties' Protective Order (Dkt No. 70).

3. Plaintiffs respectfully request that the Court seal the redacted portions of the Third Amended Complaint, attached hereto as Exhibit A.

4. Pursuant to Civil Local Rule 79-5(e)(1), Google, as the designating party, must file a declaration within 4 days establishing that all of the designated material is sealable.

5. I personally served a copy of this Declaration on Google's counsel of record by email on September 1, 2021. A Proof of Service is attached hereto as Exhibit B.

6. For the Court's convenience, a redline comparing the Second Amended Complaint to the Third Amended Complaint is attached hereto as Exhibit C.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 1st day of September, 2021, at New York, New York.

/s/ Alexander P. Frawley